

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: November 9, 2007

ANALYST: Lauren Lien

- I. **COMMITTEE:** Lindsey Graham for Senate
C00364505
Kevin Hall, Treasurer
Post Office Box 1801
Columbia, SC 29202
- II. **RELEVANT STATUTE:** 2 U.S.C. § 432(b)(3)
2 U.S.C. § 434(b)
2 U.S.C. § 439a(b)
11 CFR § 102.9
11 CFR § 102.15
11 CFR § 104.3
- III. **BACKGROUND:**

Other Violations of the Federal Election Campaign Act (Unauthorized Disbursement of Committee Funds)

On June 20, 2007, the treasurer for Lindsey Graham for Senate ("the Committee"), Kevin Hall, called the Reports Analysis Division (RAD) Analyst to report that the Committee recently discovered misappropriation of funds by Jennifer Adams, their former assistant treasurer. During a reconciliation of their books, the Committee found disbursements to Ms. Adams that were not disclosed on FEC reports, disbursements to vendors that were actually checks written out to and endorsed by Ms. Adams, and possible unauthorized credit cards opened in the Candidate's name. Mr. Hall stated that he was calling to notify the Commission of the misappropriation of funds, obtain more information about the next steps the Committee should take, and set up meetings with FEC staff (Attachment 2).

On July 3, 2007, a conference call was held between Committee treasurer Kevin Hall, assistant treasurer Scott Farmer, and RAD's Authorized Branch Chief, Assistant Branch Chief, and Analyst to discuss the Committee's current findings and how to disclose the misappropriated campaign funds. The RAD staff spoke with the Committee

about Safe Harbor Laws and Internal Control Guidelines. In addition, RAD staff advised the Committee on how to properly report these unauthorized expenditures on Line 21 (Other Disbursements) and any repayments of these funds by Ms. Adams on Line 14 (Offsets to Operating Expenditures (Refunds, Rebates, etc.)), with memo entries describing the transactions as unauthorized disbursements. The RAD Analyst emailed the Committee detailed information on how to report these transactions (Attachment 3). The Committee stated that the unauthorized transactions they had found thus far were all disbursements, and that Ms. Adams submitted a letter to the Senator's Chief of Staff, apologizing for her actions and attaching what the Committee believed to be restitution payments on a credit card (Attachment 2).

On August 10, 2007, the Committee's treasurer and assistant treasurer called the RAD Analyst with newly discovered inconsistencies with the Committee's former bank account. Mr. Hall and Mr. Farmer opened a new bank account when they initially began working with the Committee in May 2005. In working with Ms. Adams to close the previous bank account listed on the Committee's Statement of Organization (FEC FORM 1), they received a transfer check for what they believed was the amount remaining in the old account, documents from the bank stating that the account was closed, and copies of the last checks that were drawn on the account. The treasurers explained to the RAD Analyst that the bank recently certified that the documents they received were falsified and the old committee bank account remained open without their knowledge from May 2005 to July 2005. Over \$17,000.00 in unauthorized funds were both deposited into and then disbursed from the account during this time. Incoming funds came from advance checks on existing legitimate credit cards, checks drafted from the Senator's personal bank account that the Senator denies writing, and electronic checks from what appeared to be a credit card account opened by Ms. Adams in the Senator's name. Checks drafted from this account were made payable to Jennifer Adams with memo descriptions such as "salary." The Committee asked whether or not they needed to report this information, and if so, how to report it. The RAD Analyst said she would advise the Committee after researching the issue (Attachment 2).

On August 14, 2007, the RAD Analyst called Mr. Farmer to ask if the old bank account was zeroed out when funds were transferred to the new bank account, creating a clean break between campaign funds and the unauthorized funds being deposited into the account. Mr. Farmer called the next day and explained that although Ms. Adams gave the new treasurers what she said was the final check to close the old bank account, the authentic bank account records show that over \$10,000.00 remained in the account (Attachment 2).

On August 16, 2007, the RAD Analyst called Mr. Farmer to give him instructions on how to report transactions coming in and out of the bank account during the period the account was thought to be closed. The Analyst provided the Committee a guideline of submitting the amendments by October 1, 2007, so that the next new report scheduled to be filed with the Commission, the 2007 October Quarterly Report, would be correct (Attachment 2).

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On September 5, 2007, Mr. Hall and Mr. Farmer called the RAD Analyst. The South Carolina Law Enforcement Division (SLED) subpoenaed Ms. Adams' bank records and found over \$80,000.00 in additional unauthorized transactions, bringing the total estimated unauthorized activity over \$100,000.00. The Committee thought it was using pristine copies of checks to audit their books; however, the subpoena revealed that checks with those same numbers cleared through Ms. Adams' bank account. SLED explained that it appeared that when the new treasurers asked for bank records, the bank sent the records to Ms. Adams, who opened the account originally, whereupon she changed the copies of the checks before giving these records to Mr. Hall and Mr. Farmer. Mr. Farmer has since told the bank to send the copies directly to him and to no longer deal with Ms. Adams. When the RAD Analyst asked if the Committee had contacted the U.S. Department of Justice, the Committee said that SLED was also asking about jurisdiction and wanted to know if the FEC had criminal prosecution capabilities. The Committee was told that they will be referred to OGC, at which point they will be further advised about this. The Committee asked whether they should file amendments with incomplete information and continue to amend as they uncover additional information, or if they should make full amendments when they receive the subpoenaed information sometime in the future. The Analyst advised the Committee to amend their reports by the October 1, 2007 filing deadline as previously agreed upon, and to continue to amend as their findings change (Attachment 2).

On September 18, 2007, Mr. Hall called the RAD Analyst to ask whether he should get in contact with the OGC lawyers to update them on the Committee's findings and the status of their law enforcement efforts. The RAD Analyst advised Mr. Hall that OGC will contact the Committee, and subsequently informed OGC of the communication (Attachment 2).

On October 2, 2007¹, the Committee filed twenty (20) amended reports from the 2002-2008 election cycle, twelve (12) of which disclose misappropriation of campaign funds as follows: a total of \$18,172.46 in unauthorized receipts disclosed on Line 14 and a total of \$229,595.24 in unauthorized disbursements disclosed on Line 21 (Attachment 4). With this filing, the Committee submitted a letter that disclosed changes made on the amended reports and listed proper descriptions of unauthorized disbursement activity that was truncated on the actual reports (Images 27020312797-850).

On October 23, 2007, Mr. Farmer called the RAD Analyst to say that he saw the amended reports on the FEC website and wanted to set up a conference call to discuss the next steps for the Committee. The RAD Analyst returned the call on October 24, 2007, and again advised Mr. Hall that OGC will contact the Committee with more information about what the Committee needs to do next (Attachment 2).

To date, no further communications have been received from the Committee regarding these matters.

¹ On October 1, 2007, the RAD Analyst extended the October 1, 2007 deadline to October 2, 2007.

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ANN, LINDSEY OLIN

ID #90800140

NESEY GRANAN FOR SENATE
 7TH FLOOR
 LINDS FREQUENCY: QUARTERLY

PO BOX 1801

COLUMBIA

SENATE
 SC 28202

ID #C00384806

LN	TYPE	RPT TYPE	AI	PSI	REC DATE	POS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
1			A		7/13/2007	13	27020283286						
1			A		8/24/2007	13	27020283418						
26		Q1	2		7/10/2007	12	27038464420	1/01/2007 3/31/2007					
		Q1	N		4/14/2007	481	27028180880	1/01/2007 3/31/2007	2088038	1208711	132773	3881874	0
		Q1	A		8/15/2007	29	27028280722	1/01/2007 3/31/2007	-	-	-	-	-
		Q1	A		10/02/2007	480	27028313145	1/01/2007 3/31/2007	2840345	1208711	132773	3814283	0
		Q2	N		7/14/2007	295	27028280820	4/01/2007 6/30/2007	3881874	543818	185195	4040398	0
		Q2	A		7/18/2007	8	27028280045	4/01/2007 6/30/2007	3881874	543818	185195	4040398	0
		Q2	A		10/02/2007	348	27028312787	4/01/2007 6/30/2007	3814283	538018	185195	3888104	0
		Q3	N		10/15/2007	289	27028381888	7/01/2007 9/30/2007	3888104	472272	218467	4223809	0
								TOTAL		2217889	534435		

29044271488

ADAM, LINDSEY OLIN

ID #908C00149

ROSEY GRAMM FOR SENATE
 VIZI HALL
 LING FREQUENCY: QUARTERLY

PO BOX 1801

COLUMBIA

SENATE
 SC 29202

ID #C00364606

RN	TYPE	RPT	TYPE	AI	PGI	REC DATE	PGS	DES	IMAGE	COVERAGE DATES	DES	CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
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1					A	8/10/2005	11	25020343087								
RS					J	3/29/2006	6	25020180381								
RD		OS		2		9/19/2006	2	25039183966		7/01/2006	9/30/2006					
RD		YE		2		9/19/2006	2	25039183966		10/01/2006	12/31/2006					
RD		Q1		2		6/08/2006	7	25039084031		1/01/2006	3/31/2006					
RD		Q1		2		9/19/2006	3	25039183970		1/01/2006	3/31/2006					
RD		Q2		2		9/19/2006	3	25039184002		4/01/2006	6/30/2006					
RD		Q3		2		3/22/2007	3	27039404802		7/01/2006	9/30/2006					
RD		YE		2		3/22/2007	3	27039404799		10/01/2006	12/31/2006					
3		Q1		N		4/14/2005	288	25020172558		1/01/2005	3/31/2005	507574	636663	95323	1047804	0
3		Q1		A		5/19/2005	7	25020221302		1/01/2005	3/31/2005	509532	636663	95323	1049763	0
3		Q1		A		7/15/2005	17	25020291778		1/01/2005	3/31/2005	510097	636663	95323	1063327	0
3		Q1		A		7/10/2006	4	25020403288		1/01/2005	3/31/2005	-	-	-	-	-
3		Q1		A		10/02/2007	301	27020320408		1/01/2005	3/31/2005	456875	651661	115094	992862	0
3		Q2		N		7/15/2005	205	25020281239		4/01/2005	6/30/2005	1053327	319286	89915	1282867	0
3		Q2		A		10/14/2006	13	25020431879		4/01/2005	6/30/2005	1053327	319286	89915	1282877	0
3		Q2		A		10/02/2007	218	27020314809		4/01/2005	6/30/2005	992862	336861	116262	1213282	0
3		Q3		N		10/14/2006	151	25020431728		7/01/2005	9/30/2005	1282877	170098	61808	1398957	0
3		Q3		A		7/10/2006	5	25020403290		7/01/2005	9/30/2005	-	-	-	-	-
3		Q3		A		7/10/2006	7	25020403295		7/01/2005	9/30/2005	1282867	170098	61808	1398957	0
3		Q3		A		7/10/2006	4	25020403282		7/01/2005	9/30/2005	-	-	-	-	-
3		Q3		A		7/11/2006	8	25020403208		7/01/2005	9/30/2005	1282867	170098	61808	1398957	0
3		Q3		A		1/18/2007	1	27039343378		7/01/2005	9/30/2005	-	-	-	-	-
3		Q3		A		10/02/2007	156	27020320001		7/01/2005	9/30/2005	1213282	178762	66925	1325116	0

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DATE 11/08/2007
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AWAN, LINDSEY OLIN

ID #808C00148

NOBEY GRAHAM FOR SENATE
 VIN HALL
 LING FREQUENCY: QUARTERLY

PO BOX 1801

COLUMBIA

SENATE
 SC 29202

ID #C00344506

NR	TYPE	RPT TYPE	AZ	PSI	REC DATE	PGS	BEG IMAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	YE	N			1/25/2006	241	2802000001	10/01/2006 12/31/2006	1366867	401361	89006	1708322	0
3	YE	A			7/10/2006	9	28020403273	10/01/2006 12/31/2006	1366867	401588	89113	1708430	0
3	YE	A			7/11/2006	7	28020403218	10/01/2006 12/31/2006	1366867	401588	89113	1708430	0
3	YE	A			10/19/2006	1	28038252909	10/01/2006 12/31/2006	-	-	-	-	-
3	YE	A			1/18/2007	1	27038943377	10/01/2006 12/31/2006	-	-	-	-	-
3	YE	A			10/02/2007	249	27020320187	10/01/2006 12/31/2006	1325116	405588	89113	1841589	0
3	Q1	N			4/15/2006	222	28020243180	1/01/2006 3/31/2006	1708322	320367	102359	1827320	0
3	Q1	A			7/10/2006	10	28020403302	1/01/2006 3/31/2006	1708430	323357	102359	1830428	0
3	Q1	A			7/10/2006	7	28020403286	1/01/2006 3/31/2006	-	-	-	-	-
3	Q1	A			7/11/2006	7	28020403223	1/01/2006 3/31/2006	1708430	323357	102359	1830428	0
3	Q1	A			10/19/2006	1	28038252910	1/01/2006 3/31/2006	-	-	-	-	-
3	Q1	A			1/18/2007	1	27038943378	1/01/2006 3/31/2006	-	-	-	-	-
3	Q1	A			10/02/2007	227	27020314282	1/01/2006 3/31/2006	1841589	323357	102359	1862587	0
3	Q2	N			7/14/2006	220	28020483002	4/01/2006 6/30/2006	1930428	304732	87434	2167728	0
3	Q2	A			10/19/2006	5	28020881536	4/01/2006 6/30/2006	-	-	-	-	-
3	Q2	A			1/18/2007	4	27020011725	4/01/2006 6/30/2006	-	-	-	-	-
3	Q2	A			10/02/2007	222	27020314080	4/01/2006 6/30/2006	1862587	304882	87434	2100038	0
3	Q3	N			10/14/2006	205	28020781830	7/01/2006 9/30/2006	2167728	235168	70470	2332423	0
3	Q3	A			10/19/2006	1	28038252908	7/01/2006 9/30/2006	-	-	-	-	-
3	Q3	A			4/24/2007	4	27020182386	7/01/2006 9/30/2006	-	-	-	-	-
3	Q3	A			10/02/2007	205	27020313855	7/01/2006 9/30/2006	2100035	235168	70470	2284732	0
3	YE	N			1/31/2007	230	27020080001	10/01/2006 12/31/2006	2332423	404828	129215	2608036	0
3	YE	A			4/24/2007	1	270389432206	10/01/2006 12/31/2006	-	-	-	-	-
3	YE	A			10/02/2007	230	27020313825	10/01/2006 12/31/2006	2284732	404828	129215	2540345	0
TOTAL										2841345	758878		

29044231500

JAN, LINDSEY OLIN

ID #90800149

ROSEY GRAMM FOR SENATE
IL OVERLEY
LING FREQUENCY: QUARTERLY

PO BOX 1155

GENECA

SENATE
SC 29679

ID #C00364605

LN	TYPE	RPT	TYPE	AI	PGI	REC	DATE	POS	BEG	IMAGE	COVERAGE	DATES	BEG	CASH	RECEIPTS	DISBURSE	END	CASH	DEBTS	BY
RS							10/14/2003	6	23020380131											
RS		Q1		2			12/08/2003	4	23038280868		1/01/2003	3/31/2003								
RS		Q1		2			10/08/2004	3	24038830792		1/01/2003	3/31/2003								
RS		Q2		2			12/08/2003	4	23038280862		4/01/2003	6/30/2003								
RS		Q2		2			10/08/2004	3	24038830779		4/01/2003	6/30/2003								
RS		Q3		2			1/20/2004	6	24038271233		7/01/2003	9/30/2003								
RS		Q3		2			10/12/2004	3	24038840825		7/01/2003	9/30/2003								
RS		YE		2			3/23/2004	6	24038349110		10/01/2003	12/31/2003								
RS		Q1		2			10/12/2004	4	24038840821		1/01/2004	3/31/2004								
RS		Q1		2			5/08/2005	2	25038810285		1/01/2004	3/31/2004								
RS		Q2		2			10/19/2004	4	24038872842		4/01/2004	6/30/2004								
RS		Q2		2			3/24/2005	3	25038782908		4/01/2004	6/30/2004								
RS		Q2		2			5/08/2005	2	25038810287		4/01/2004	6/30/2004								
RS		Q3		2			4/19/2005	7	25038783088		7/01/2004	9/30/2004								
RS		Q3		2			5/05/2005	2	25038810289		7/01/2004	9/30/2004								
RS		YE		2			3/22/2005	4	25038781985		9/01/2004	12/31/2004								
RS		YE		2			5/05/2005	3	25038810291		10/01/2004	12/31/2004								
S		Q1		N			4/15/2003	58	23020192880		1/01/2003	3/31/2003	123891	63110	128532	58569	0			
S		Q1		A			11/22/2004	1	25038891844		1/01/2003	3/31/2003	40741	0	0	40741	-			
S		Q1		A			12/01/2004	68	24021072285		1/01/2003	3/31/2003	40741	85610	83088	33254	0			
S		Q1		A			5/19/2005	7	25020221246		1/01/2003	3/31/2003	40741	85610	83088	33254	0			
S		Q1		A			10/02/2007	77	27020321832		1/01/2003	3/31/2003	32420	85270	128860	-	0			
S		Q2		N			7/15/2003	186	23020310736		4/01/2003	6/30/2003	31164	323598	130754	224008	0			
S		Q2		A			11/22/2004	1	25038891845		4/01/2003	6/30/2003	40741	0	0	40741	-			
S		Q2		A			12/01/2004	178	24021072032		4/01/2003	6/30/2003	33254	300648	157581	178621	0			

9044231501

WYN, LINDSEY OLIN

ID 9908C00149

GREY GRAHAM FOR SENATE
IL BYEMLEY
ING FREQUENCY: QUARTERLY

PO BOX 1166

SENECA

SENATE
SC 29679

ID 9C0394606

IN TYPE	RPT TYPE	AI	PGI	REC DATE	POS	BEG INAGE	COVERAGE DATES	BEG CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3	Q2	A		5/18/2005	7	25020221253	4/01/2003 8/30/2003	33254	300048	157551	176621	0
3	Q2	A		7/18/2005	9	25020291834	4/01/2003 8/30/2003	33254	300048	157551	176621	0
3	Q2	A		10/02/2007	187	27020321446	4/01/2003 8/30/2003	-	300036	142334	148512	0
3	Q3	N		10/18/2003	136	23020421839	7/01/2003 9/30/2003	224008	236534	143950	316592	0
3	Q3	A		2/18/2004	8	24020142467	7/01/2003 9/30/2003	-	-	-	-	0
3	Q3	A		11/22/2004	1	25030891846	7/01/2003 9/30/2003	40741	0	0	40741	-
3	Q3	A		12/01/2004	135	24021071897	7/01/2003 9/30/2003	176621	236084	133915	276791	0
3	Q3	A		5/18/2005	7	25020221250	7/01/2003 9/30/2003	176621	236084	133915	276791	0
3	Q3	A		7/18/2005	11	25030291823	7/01/2003 9/30/2003	176621	236341	133915	276048	0
3	Q3	A		10/02/2007	142	27020321303	7/01/2003 9/30/2003	148512	240690	153203	235999	0
3	YE	N		1/31/2004	167	24020062047	10/01/2003 12/31/2003	316592	285699	143111	461170	0
3	YE	A		11/22/2004	1	25030891847	10/01/2003 12/31/2003	40741	0	0	40741	-
3	YE	A		12/01/2004	167	24021070916	10/01/2003 12/31/2003	276791	286136	143995	421334	0
3	YE	A		5/18/2005	7	25020221257	10/01/2003 12/31/2003	276791	285998	143995	421084	0
3	YE	A		7/18/2005	14	25020291808	10/01/2003 12/31/2003	276048	267136	143995	422591	0
3	YE	A		10/02/2007	182	27020321121	10/01/2003 12/31/2003	236999	299729	159084	379634	0
3	CA	N		11/22/2004	7	25020012940	1/01/2003 12/31/2003	40741	906783	528190	418334	0
3	Q1	N		4/15/2004	78	24020240780	1/01/2004 3/31/2004	455000	103998	92736	455990	0
3	Q1	A		11/12/2004	4	24021003187	1/01/2004 3/31/2004	-	-	-	-	0
3	Q1	A		12/01/2004	77	24021072206	1/01/2004 3/31/2004	421334	104898	77748	448284	0
3	Q1	A		1/11/2005	6	25020012947	1/01/2004 3/31/2004	419334	104898	77748	448284	0
3	Q1	A		4/18/2005	78	25020181789	1/01/2004 3/31/2004	-	106829	-	-	0
3	Q1	A		5/19/2005	7	25020221274	1/01/2004 3/31/2004	421084	106829	77748	448995	0
3	Q1	A		6/03/2005	8	25020222732	1/01/2004 3/31/2004	421084	106829	77748	448995	0
3	Q1	A		7/18/2005	7	25020291802	1/01/2004 3/31/2004	422991	106829	77748	450472	0
3	Q1	A		10/02/2007	83	27020321028	1/01/2004 3/31/2004	379634	110898	108795	381627	0
3	Q2	N		7/09/2004	120	24020423077	4/01/2004 8/30/2004	455990	178102	94903	647159	0
3	Q2	A		11/17/2004	4	24021010282	4/01/2004 8/30/2004	-	-	-	-	0
3	Q2	A		1/26/2005	121	25020032164	4/01/2004 8/30/2004	448284	178102	94903	531483	0
3	Q2	A		4/18/2005	120	25020181847	4/01/2004 8/30/2004	447217	177102	96903	528416	0
3	Q2	A		5/19/2005	7	25020221261	4/01/2004 8/30/2004	448995	177102	96903	530164	0
3	Q2	A		6/03/2005	7	25020222740	4/01/2004 8/30/2004	448995	177102	96903	530164	0
3	Q2	A		7/18/2005	8	25020291793	4/01/2004 8/30/2004	450472	178102	96885	531889	0
3	Q2	A		10/02/2007	181	27020320677	4/01/2004 8/30/2004	381827	216920	116534	452213	0

29944231502

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DATE 11/08/2007

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ANAN, LINDSEY OLIN

ID #00SC00148

HISSEY GRAHAM FOR SENATE
 IL BYRDLEY
 LING FREQUENCY: QUARTERLY

PO BOX 1188

SENECA

SENATE
 SC 29878

ID #C00364806

RI	TYPE	RPT TYPE	AJ	POI	REC DATE	POB	DES	IMAGE	COVERAGE DATES	DES CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3		Q1	N		4/12/2002	533	22020180440		1/01/2002 3/31/2002	2036710	1136188	381848	2811048	0
3		Q1	A		11/20/2002	45	22020672274		1/01/2002 3/31/2002	-	-	-	-	-
3		Q1	A		2/26/2003	544	22020130001		1/01/2002 3/31/2002	2077184	1148281	382883	2883612	0
3		Q1	A		5/19/2004	525	24020332719		1/01/2002 3/31/2002	1913885	1148158	388985	2881678	0
3		Q1	A		5/20/2004	539	24020380001		1/01/2002 3/31/2002	1913885	1148158	388985	2881678	0
3		12P	N		5/28/2002	231	22020331029		4/01/2002 5/22/2002	2811048	238835	814173	2435810	0
3		12P	A		12/12/2002	10	22020671544		4/01/2002 5/22/2002	-	-	-	-	-
3		12P	A		12/12/2002	239	22020671554		4/01/2002 5/22/2002	2811048	238482	814280	2435250	0
3		12P	A		12/13/2002	5	22020671855		4/01/2002 5/22/2002	-	-	-	-	-
3		12P	A		1/07/2003	238	22020010814		4/01/2002 5/22/2002	2435250	238482	814280	2058451	0
3		12P	A		1/31/2003	247	22020083034		4/01/2002 5/22/2002	2882812	238482	814280	2488814	0
3		12P	A		5/19/2004	239	24020332480		4/01/2002 5/22/2002	2881678	238482	817830	2312329	0
3		12P	A		5/20/2004	240	24020352850		4/01/2002 5/22/2002	2881678	238482	817830	2312329	0
3		Q2	N		7/15/2002	143	22020820148		5/23/2002 6/30/2002	2433892	422308	139102	2717089	0
3		Q2	A		9/04/2002	173	22020832571		5/23/2002 6/30/2002	2433892	422308	139102	2717089	0
3		Q2	A		2/26/2003	206	22020131792		5/23/2002 6/30/2002	2487814	422308	139102	2771021	0
3		Q2	A		5/18/2004	160	24020332320		5/23/2002 6/30/2002	2312329	422308	142488	2882150	0
3		Q2	A		5/20/2004	168	24020353080		5/23/2002 6/30/2002	2312329	422308	142488	2882150	0
3		Q2	A		5/20/2004	168	24020380540		5/23/2002 6/30/2002	2313329	422308	142488	2883150	0
3		Q2	A		5/26/2004	168	24020383248		5/23/2002 6/30/2002	2313329	422308	142488	2883150	0
3		Q3	N		10/15/2002	488	22020730001		7/01/2002 9/30/2002	2788258	732726	743314	2758870	0
3		Q3	A		1/31/2003	13	22020683021		7/01/2002 9/30/2002	-	-	-	-	-
3		Q3	A		5/20/2004	474	24020380709		7/01/2002 9/30/2002	2593150	780986	734837	2619308	0
3		Q3	A		5/26/2004	474	24020370001		7/01/2002 9/30/2002	2593150	780986	734837	2619308	0
3		12Q	N		10/21/2002	112	22020802405		10/01/2002 10/16/2002	2758670	157042	1808869	1105744	0
3		12Q	A		1/22/2003	114	22020022298		10/01/2002 10/16/2002	2758670	157042	1794869	1120744	0
3		12Q	A		1/23/2003	7	22020021862		10/01/2002 10/16/2002	-	-	-	-	-
3		12Q	A		2/28/2003	117	22020130892		10/01/2002 10/16/2002	2780434	157042	1794869	1122507	0
3		12Q	A		3/10/2003	111	22020133874		10/01/2002 10/16/2002	2780434	157042	1794869	1122507	0
3		12Q	A		5/20/2004	113	24020381463		10/01/2002 10/16/2002	2618308	164013	1788800	996722	0
3		12Q	A		5/26/2004	113	24020370750		10/01/2002 10/16/2002	2618308	164013	1788800	996722	0
3		30Q	N		12/03/2002	271	22020813129		10/17/2002 11/25/2002	1105744	448429	1465189	88973	0

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NAH, LINDSEY OLIN

ID 9908C00148

DOEY GRAMMA FOR SENATE
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ING FREQUENCY: QUARTERLY

PO BOX 1155

SENECA

SENATE
SC 28678

ID 9C00384508

N	TYPE	RPT TYPE	AI	PBI	REC DATE	POS	BES IMAGE	COVERAGE DATES	BES CASH	RECEIPTS	DISBURSE	END CASH	DEBTS BY
3		308	A		2/28/2003	282	23020130708	10/17/2002 11/25/2002	1122807	448428	1488188	106737	0
3		308	A		5/20/2004	213	24020381183	10/17/2002 11/25/2002	986722	474834	1447308	24047	0
3		308	A		8/28/2004	275	24020370475	10/17/2002 11/25/2002	986722	474834	1447308	24047	0
3		308	A		2/15/2006	12	28020082021	10/17/2002 11/25/2002	986722	474834	1447308	24047	0
3		308	A		10/02/2007	278	27020321758	10/17/2002 11/25/2002	1018335	448433	1487283	6475	0
3	YE		N		1/31/2003	85	23020060145	11/28/2002 12/31/2002	105237	92018	84763	132481	0
3	YE		A		2/28/2003	47	23020130845	11/28/2002 12/31/2002	106737	92018	74763	123881	0
3	YE		A		5/20/2004	67	24020381388	11/28/2002 12/31/2002	24047	93712	77018	40741	0
3	YE		A		8/28/2004	67	24020370863	11/28/2002 12/31/2002	24047	93712	77018	40741	0
3	YE		A		8/18/2004	11	24020711043	11/28/2002 12/31/2002	24047	93712	77018	40741	0
3	YE		A		10/02/2007	48	27020321709	11/28/2002 12/31/2002	6475	93712	67767	32420	0
TOTAL									6350048	6788060			

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How to Report Misappropriation of Funds

Unauthorized use of bank account

Receipts

- Itemized on Line 14, "Offsets to Operating Expenditures."
- Each of these receipts must have an accompanying MEMO text that describes the transaction is "unauthorized bank deposit to former account."

Disbursements

- Itemized on Line 21, "Other Disbursements."
- Each of these payments must have an accompanying MEMO text that describes the transaction is "Unauthorized payment to ___ from former account"

29044231508

Lindsey Graham for Senate (C00364505)**Overview of Unauthorized Activity Disclosed on Amended Reports¹**

2002 30-Day Post-General Report (Image 27020322028)	\$0.00	\$11,252.00
2003 April Quarterly Report (Images 27020321703-04)	\$0.00	\$26,770.00
2003 July Quarterly Report (Image 27020321625-26)	\$0.00	\$14,438.27
2003 October Quarterly Report (Image 27020321440)	\$0.00	\$17,230.55
2003 Year End Report (Images 27020321296-99)	\$0.00	\$21,682.79
2004 April Quarterly Report (Images 27020321111-17)	\$0.00	\$37,463.77
2004 July Quarterly Report (Images 27020321020-23)	\$0.00	\$23,022.24
2004 October Quarterly Report (Images 27020320871-73)	\$0.00	\$16,493.13
2004 Year End Report (Images 27020320771-72)	\$0.00	\$15,741.68²
2005 April Quarterly Report (Images 27020320641, 27020320695-98)	\$248.24	\$17,726.02
2005 July Quarterly Report (Images 27020314668-69, 27020314717-20)	\$15,259.95³	\$22,660.82
2005 October Quarterly Report (Images 27020320101-02, 27020320150-51)	\$2,664.27	\$5,114.20

¹ The Committee submitted a letter (Images 27020312797-850) with the amended reports filed on 10/2/07. The letter discloses all of the changes made on the amended reports and lists proper descriptions of unauthorized disbursement activity, which is truncated on the actual reports. The figures used to estimate the amount of unauthorized activity includes both what is listed in the letter and what is reported on the amendments.

² Memo Entry: Jennifer Adams on 10/19/04 for \$1,150.00 not included in total.

³ Memo Entry: Palmetto PAC on 4/12/05 for \$54.85 not included in total.

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